### **Baker & Hostetler LLP**

45 Rockefeller Plaza New York, NY 10111 Telephone: (212) 589-4200

Facsimile: (212) 589-4201

David J. Sheehan Nicholas J. Cremona

Attorney for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and for the Estate of Bernard L. Madoff

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

NINE THIRTY LL INVESTMENTS, LLC, a Delaware limited liability company, NINE THIRTY CAPITAL PARTNERS, LLC, a Delaware limited liability company, LEVY FAMILY PARTNERS LLC, a Delaware limited liability company, NINE THIRTY PARTNERS HOLDINGS, LLC, a Delaware limited liability company, and STUART J. RABIN,

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04443 (SMB)

# STIPULATION FOR EXTENSION OF TIME TO RESPOND FOR DEFENDANT LEVY FAMILY PARTNERS LLC

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the date before which defendant Levy Family Partners LLC ("Defendant") may move, answer or otherwise respond to the Complaint is extended up to and including October 30, 2015.

The purpose of this stipulated extension is to provide additional time for Defendant to answer, move against, or otherwise respond to the Complaint. Nothing in this stipulation is a waiver of the Defendant's right to request from the Court a further extension of time to answer, move or otherwise respond and/or the Trustee's right to object to any such request.

Except as expressly set forth herein, the parties to this stipulation reserve all rights and defenses they may have, and entry into this stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this stipulation shall be deemed an original. This stipulation is entered into pursuant to the Order Granting Supplemental Authority to Stipulate to Extensions of Time to Respond and Adjourn Pre-Trial Conferences (ECF No. 10106) in the above-captioned case (No. 08-01789 (SMB)).

Dated: July 17, 2015

Of Counsel:

### **BAKER & HOSTETLER LLP**

11601 Wilshire Boulevard, Suite 1400 Los Angeles, California 90025-0509

Telephone: 310.820.8800 Facsimile: 310.820.8859 Michael R. Matthias

Email: mmatthias@bakerlaw.com

Of Counsel:

### **SPERLING & SLATER**

55 W. Monroe Street, Suite 3200

Chicago, Illinois 60603 Telephone: 312.641.3200 Facsimile: 312.641.6492 Michael G. Dickler

Email: mdickler@sperling-law.com

### BAKER & HOSTETLER LLP

By: s/Nicholas J. Cremona

45 Rockefeller Plaza

New York, New York 10111 Telephone: 212.589.4200 Facsimile: 212.589.4201

David J. Sheehan

Email: dsheehan@bakerlaw.com

Nicholas J. Cremona

Email: ncremona@bakerlaw.com

Attorney for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and for the Estate of Bernard L. Madoff

#### WOLFF & SAMSON PC

By: <u>s/Ronald L. Israel</u>

140 Broadway, 46<sup>th</sup> Floor New York, New York 10005 Telephone: 973.530.2045 Facsimile: 973.530.2245

Ronald L. Israel

Email: risrael@wolffsamson.com

Attorneys for Defendant Levy Family Partners LLC